



SFUND RECORD CTR
88135551
2166-06130

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

SFUND RECORDS CTR
2166-06130

75 Hawthorne Street

San Francisco, Ca. 94105-3901

NOV 15 1993

CERTIFIED MAIL NO. P 243 066 605
RETURN RECEIPT REQUESTED
RWQCB File Numbers: 111.0788

Mr. Renzie Pintoe
NUPLA Plastics Corporation
11912 Sheldon Street
Sun Valley, California 91352

RE: Request for Information
NUPLA Plastics Corporation
11912 Sheldon Street
Sun Valley, California 91352

Dear Mr. Pintoe:

The United States Environmental Protection Agency (EPA) is conducting an investigation of soil and groundwater contamination and threatened contamination in the San Fernando Valley. The purpose of this investigation is to determine the nature, cause, and extent of the release of hazardous substances in the area; to determine the source(s) or potential source(s) of such releases and/or potentially responsible parties; and to assess the effects of any contamination on the environment and public health.

As part of this investigation, EPA needs historical and current information from companies currently or previously located at or near the area of known or suspected contamination. EPA has reason to believe that you may be in possession of such information. Therefore, pursuant to the authority of Section 104 of CERCLA, 42 U.S.C. § 9604, and Section 3007 of RCRA, 42 U.S.C. § 6972, you are hereby requested to respond to the Information Request set forth herein.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully within thirty-five (35) days of receipt can result in enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended, and/or Section 3008 of RCRA. Each of these statutes permits EPA to seek imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

Pursuant to 40 CFR § 2.310(h), you are hereby furnished with notice of the contemplated disclosure by EPA of the information provided in response to this Information Request to authorized representatives of EPA. Any comments on this contemplated action must be submitted to EPA at the 75 Hawthorne Street address specified below within thirty-five (35) days of receipt of this Information Request.

The information that EPA plans to disclose to its authorized representatives includes any response to this Information Request. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

1. PRC Environmental Management, Inc.
EPA Contract Number 068-W9-0009
2. CH2M Hill California, Inc.
EPA Contract Number 068-W9-0031
3. Labat-Anderson, Inc.
EPA Contract Number 068-W9-0052
4. California State Water Resources Control Board and
California Regional Water Quality Control Board, Los
Angeles Region
EPA Cooperative Agreement Number V-009472-01-4

This information may be made available to these authorized representatives of EPA for any or all of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. § 2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives.

You must respond to the following Information Request by letter, signed by a duly authorized officer of the company, submitted by certified mail to the address specified below within thirty-five (35) days of your receipt of this Request.

Your response should include the name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this matter.

If you are not claiming confidentiality in regard to your response, or if you are claiming confidentiality in regard to your response but do not have any comments to submit to EPA regarding EPA's disclosure of such confidential information to its authorized representatives, submit your response to:

Colette Kostelec
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
P.O. Box 193036
San Francisco, CA 94119-3036

If you are claiming confidentiality in regard to your response and have comments to submit to EPA regarding EPA's disclosure of such confidential information to its authorized representatives, submit your response and any comments regarding the disclosure of your response to authorized representatives of EPA to:


Colette Kostelec
South Coast Groundwater Section (H-6-4)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Please include in your response to the Information Request a notarized affidavit on behalf of Respondent stating that a diligent record search has been completed and that there has been a diligent interview of present and former employees who may have knowledge of the requested information. Also include in the affidavit a statement that all information responsive to the Information Request has been forwarded to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

If you need further information concerning technical issues, please contact Colette Kostelec at (415) 744-2253. If you have any legal questions please contact, or have your attorney contact Thomas Mintz, Assistant Regional Counsel, at (415) 744-1333.

Sincerely yours,


for David B. Jones, Chief
Remedial Action Branch

Attachment

cc: Robert Ghirelli, Executive Officer
Los Angeles Regional Water Quality Control Board

Colette Kostelec, South Coast Groundwater Section, H-6-4

Thomas Mintz, Assistant Regional Counsel, ORC

INFORMATION REQUEST

Instructions

1. A separate response must be made to each of the Questions set forth in this Information Request.
2. Precede each answer with the number of the question to which it corresponds.
3. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA thereof as soon as possible.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. For each and every Question contained herein, identify all documents consulted or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
6. For each and every Question contained herein, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any Questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
7. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody, or control, then identify any persons from whom you believe such information may be obtained.
8. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 104(e)(7) of CERCLA, as amended by SARA, 42 U.S.C. § 9604(e)(7), and 40 C.F.R. 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or some other suitable form of notice employing language such as "trade secret" or "proprietary". Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in CERCLA Section 104(e)(7). If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

9. Where specific information has not been memorialized in any document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "you" or "Respondent" shall mean the company named in the address of this Request, the company's officers, managers, employees, contractors, trustees, successors, assigns, and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, unincorporated association, partnership, corporation, trust or other entity.
3. The term "the facility" shall mean and include the property on or about 11912 Sheldon Street in Sun Valley, California.
4. The term "hazardous substance" shall have the definition set forth in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term "pollutant or contaminant" shall have the definition set forth in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants and contaminants with any other substances, including petroleum products.
6. The term "hazardous waste" shall have the definition set forth in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5).
7. The term "solid waste" shall have the definition set forth in Section 1004(27) of RCRA, 42 U.S.C. § 6903(27).
8. The term "hazardous material" shall mean all hazardous substances, pollutants, and contaminants as defined above.
9. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
10. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.

11. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (e.g. invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or subject matter.
12. The term "release" shall have the definition contained in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant or contaminant.
13. The terms "document" and "documents" shall include: (a) writing of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or film record, any photograph, sound recording on any type of device, any punch card, disk or disk pack; (b) any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disk or disk pack, tape or other type of memory and together with printouts of such punch card, disk, or disk pack, tape or other type of memory); (c) every copy of each document which is not an exact duplicate of a document which is produced; (d) every copy which has any writing, figure or notation, annotation or the like of it; (e) drafts; (f) attachments to or enclosures with any document; and (g) every document referred to in any other document.
14. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
15. The term "arrangement" means every separate contract or other agreement between two or more persons.

Questions

1. List the EPA RCRA Identification Number(s) of the Respondent, if any.
2. Describe the current business operations and activities at the facility. Include a description of the goods and services produced and furnished and an explanation of the processes involved in their production and furnishing. In addition, provide a summary of any and all changes in the types of goods and services produced and furnished, including but not limited to any changes in the production or furnishing processes and the dates of such changes since operations began at the facility.
3. Identify the current owner(s) of the facility. State the dates during which the current owner owned, operated, or leased any portion of the facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to, purchase and sale agreements, deeds, and leases.
4. Identify all prior owners of the facility. For each prior owner further identify:
 - a. The dates of ownership;
 - b. All evidence that hazardous materials were released or threatened to be released at the facility during the period that they owned the facility.
5. Identify the prior operators and lessees of the facility. For each such operator or lessee, further identify:
 - a. The dates of their operations at or lease of the facility;
 - b. The nature of their operations at the facility;
 - c. All evidence that hazardous materials were released or threatened to be released at the facility during the period in which they were operating at the facility.
6. Provide a scaled map of the facility which includes the locations of significant features. Describe the physical characteristics of the facility, including but not limited to, the following:
 - a. Surface structures (e.g., building, tanks, etc);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);

- c. Ground water wells and dry wells, including drilling logs;
 - d. Past and present storm water drainage system, sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
 - e. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the facility, or to the property itself (e.g., excavation work) and state the dates on which such changes occurred.
7. Provide all existing technical or analytical information about the facility, including but not limited to, data and documents related to soil, water (ground and surface), geology, hydrogeology, or air quality on and about the facility.
8. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrogeology, or air quality on or about the facility? If so, identify:
- a. The nature and scope of these investigations;
 - b. The contractors or other persons that will undertake these investigations;
 - c. The purpose of the investigations;
 - d. The dates when such investigations will take place and be completed;
 - e. Where on the facility such investigations will take place.
9. Did you acquire or lease the facility after the disposal or placement of any hazardous substances on, in, or at the facility? Describe all of the facts on which you base the answer to this Question.
10. At the time you acquired or leased the facility, did you know or have reason to know that any hazardous substance was disposed of on, in, or at the facility? Describe all investigations of the facility that you took prior to acquiring or leasing the facility, and all of the facts on which you base the answer to this Question.
11. Did you ever transport to the facility or use, purchase, generate, store, treat, dispose, or otherwise handle at the facility any hazardous materials? If the answer to this question is anything but an unqualified "no", identify for the entire time period the facility has been in operation:

- a. In general terms, the types of hazardous material transported, used, purchased, generated, stored, treated, disposed, or otherwise handled, and the purposes for your transportation, use, purchase, generation, storage, treatment, disposal, or handling of such hazardous materials;
- b. The name, Chemical Abstract Service (CAS) number, chemical composition, characteristics, and physical state (e.g., solid, liquid, gas) of each hazardous material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. The persons who supplied you with each such hazardous material or how each such hazardous material was generated by you;
- d. How each such hazardous material was transported, used, purchased, stored, treated, disposed, or otherwise handled by you;
- e. The time period during which each such hazardous material was transported, used, purchased, generated, stored, treated, disposed, or otherwise handled by you;
- f. Where each such hazardous material was used, purchased, generated, stored, treated, disposed, or otherwise handled by you, describing the location(s) and providing a map or diagram of such location(s). Location information should include, but is not limited to, information pertaining to tanks, ponds, treatment facilities, and other units where hazardous materials were used, generated, stored, treated or disposed, but which may no longer exist;
- g. The persons who transported and/or disposed of each such hazardous material. If disposal off of the facility occurred, provide a detailed description, including copies of manifests, and identify the location where the hazardous material was transported;
- h. The annual quantity of each such hazardous material used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you, reported in gallons for liquids and pounds for solids for every year the facility was in operation.

Provide Material Safety Data Sheets (MSDS) for each hazardous material used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you.

12. Identify all leaks, spills, releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the facility. In addition, identify:
 - a. When such releases occurred or may occur;
 - b. How the releases occurred or may occur;
 - c. What hazardous materials were released or may be released;
 - d. What amount of each such hazardous material was released or may be released;
 - e. Where such releases occurred or may occur, describing the location(s) and providing a map or diagram of such location(s);
 - f. Any and all activities undertaken in response to each such release or threatened release;
 - g. Any and all investigations of the circumstances, nature, extent, or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken;
 - h. Whether any report(s) of any such release(s) was (were) made to any public agency, and the content of that (those) report(s);
 - i. All persons with information relating to subparts a. through h. of this Question.
13. If any releases or threatened release identified in response to Question 12, above, occurred into any subsurface disposal system, floor drain, sump, or dry well inside or under any buildings located on the facility, further identify:
 - a. Precisely where the disposal system, floor drain, sump, or dry well is and was located;
 - b. When the disposal system, floor drain, sump, or dry well was installed;
 - c. Whether the disposal system, floor drain, sump, or dry well was connected to pipes;
 - d. Where such pipes are or were located, describing the location(s) and providing a map or diagram of such location(s);

- e. When such pipes were installed;
 - f. How and when such pipes were replaced, repaired, or otherwise changed.
14. Is the facility currently connected to a sewer line? If so, identify the sewage system, date of connection, and type of wastes discharged. If you are or at some time operated the facility without a sewer line connection, identify the method of waste disposal that you use or did use. Specifically, have you or are you using leach field(s), septic tank(s), or any other method of disposal at the facility. Provide copies of any sewer permits, including but not limited to industrial waste permits.
15. Describe any acts or omissions of any persons, other than your employees, agents, or those persons with whom you had a contractual relationship, that may have caused any release or threat of release of hazardous materials at the facility and any damages relating thereto and identify such persons. In addition:
- a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties, and the consequence that could foreseeably result from such acts or omissions;
 - b. Describe the care you exercised with respect to the hazardous materials found at the facility.
16. Identify all divisions and subsidiary companies, corporations, and business entities of Respondent. Describe your interest in or ownership of each company, corporation, or business entity. Identify all parent companies or corporations of Respondent, and describe their interest in or ownership of Respondent. In addition, provide a company and/or corporate history, showing all mergers, acquisitions, name changes, or changes in business form of Respondent and its parents or subsidiaries, including the date of each such change or event. This information may be presented as a table or illustration.
17. Provide a copy of the current Articles of Incorporation and By-laws of Respondent. In addition, provide copies of the Articles of Incorporation for all corporations which are predecessors of Respondent.
18. State Respondent's Standard Industrial Classification ("SIC") Code(s), if any, including the date the code(s) was determined or last updated.
19. Provide copies of any and all operating permits issued to Respondent by the South Coast Air Quality Management District.

20. Do you currently own or operate any other facility, or have you owned or operated any other facilities in the past, located in the San Fernando Valley? If so, provide the following information:

- a. Name of facility;
- b. Brief description of operations taking place at facility, including principal product or service sold or furnished;
- c. Date you acquired or otherwise began operations at the facility; and
- d. Date you sold or otherwise ceased operations at the facility, if applicable.

ated on the reverse side?
Is your RETURN

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

2166-06130

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. Renzie Pintoe
NUPLA Plastics Corporation
11912 Sheldon Street
Sun Valley, California 91352

4a. Article Number

P 243 066 605

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

5. Date of Delivery

11-16

5. Signature (Addressee)

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

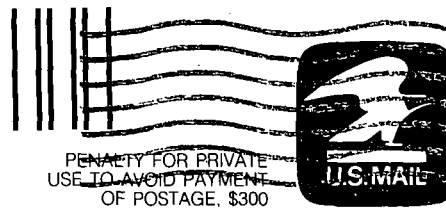
PS Form 3811, December 1991

★U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE

Official Business



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300

Print your name, address and ZIP Code here

COLETTE KOSTELEC, H-6-4
U.S. EPA, REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105

04

